

1 G. HOPKINS GUY, III (STATE BAR NO. 124811)  
I. NEEL CHATTERJEE (STATE BAR NO. 173985)  
2 MONTE COOPER (STATE BAR NO. 196746)  
ROBERT D. NAGEL (STATE BAR NO. 211113)  
3 JOSHUA H. WALKER (STATE BAR NO. 224940)  
ORRICK, HERRINGTON & SUTCLIFFE LLP  
4 1000 Marsh Road  
Menlo Park, CA 94025  
5 Telephone: 650-614-7400  
Facsimile: 650-614-7401

6 Attorneys for Plaintiff  
7 THEFACEBOOK, INC.

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 COUNTY OF SANTA CLARA

10  
11 THEFACEBOOK, INC.,  
12 Plaintiff,

13 v.

14 CONNECTU LLC, CAMERON  
15 WINKLEVOSS, TYLER WINKLEVOSS,  
HOWARD WINKLEVOSS, DIVYA  
16 NARENDRA, AND DOES 1-25,

17 Defendants.

CASE NO. 1:05-CV-047381

**THEFACEBOOK, INC.'S FIRST SET  
OF SPECIAL INTERROGATORIES  
TO DEFENDANT DIVYA  
NARENDRA**

18  
19 **PROPOUNDING PARTY:** THEFACEBOOK, INC.

20 **RESPONDING PARTY:** DIVYA NARENDRA

21 **SET NO.:** ONE (NOS. 1-23)

22  
23 YOU ARE HEREBY REQUESTED, pursuant to California Code of Civil Procedure  
24 section 2030, to answer the following interrogatories separately and fully, in writing, and under  
25 penalty of perjury, within thirty (30) days after service.

26 **DEFINITIONS**

27 A. "ANY" shall be understood to include and encompass "ALL." As used herein, the  
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1 WINKLEVOSS COMPANIES' licenses OR registrations regarding the ability to do business in  
2 California.

3 **INTERROGATORY NO. 10:**

4 IDENTIFY the first date YOU knew OR believed that FACEBOOK, its servers, facilities,  
5 offices, OR personnel were located in California.

6 **INTERROGATORY NO. 11:**

7 IDENTIFY the services provided through the connectu.com website to USERS, including  
8 without limitation, how the services are provided.

9 **INTERROGATORY NO. 12:**

10 IDENTIFY ALL USERS, including without limitation, their respective email addresses.

11 **INTERROGATORY NO. 13:**

12 IDENTIFY the circumstances surrounding the formation AND maintenance of  
13 CONNECTU as a limited liability company, including without limitation, filings, investments,  
14 COMMUNICATIONS, PERSONS involved, capitalization, directors, officers, attorneys,  
15 investors, AND reasons for the formation, as well as organizational meetings, including without  
16 limitation meetings of directors, officers, board member, AND Members, Managers AND Board  
17 of Managers, as defined in the Limited Liability Company Operating Agreement of ConnectU,  
18 LLC – bates numbers C011285 through 011335.

19 **INTERROGATORY NO. 14:**

20 IDENTIFY current AND former directors, officers, employees, AND agents of  
21 CONNECTU (including without limitation, Members, Managers AND Board of Managers as  
22 defined in the Limited Liability Company Operating Agreement of ConnectU, LLC – bates  
23 numbers C011285 through 011335), HARVARDCONNECTION, AND WINKLEVOSS  
24 COMPANIES, including without limitation, dates in these positions, duties, job descriptions,  
25 authorities, AND responsibilities.

26 **INTERROGATORY NO. 15:**

27 IDENTIFY ALL of YOUR, CONNECTU'S, HARVARDCONNECTION'S OR  
28 WINKLEVOSS COMPANIES' advertising, promotions AND marketing activities directed, at

1 Agreement of ConnectU, LLC – bates numbers C011285 through 011335, including without  
2 limitation, the dollar amount, the recipient, the reason, AND the date of each Distribution.

3 **INTERROGATORY NO. 22:**

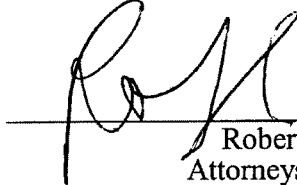
4 IDENTIFY ALL universities, colleges, high schools, AND institutes of higher learning  
5 located in California at which CONNECTU provides OR provided services including without  
6 limitation, access to the connectu.com website, including without limitation University of  
7 California (all campuses), California State University (all campuses), Stanford University, San  
8 Jose State University, Santa Clara University, University of San Francisco, University of  
9 Southern California, University of San Diego, San Diego State University, AND Claremont  
10 Colleges (all campuses), as well as the USERS using email domains (*e.g.*, name@stanford.edu)  
11 from those universities, colleges, high schools, AND institutes of higher learning.

12 **INTERROGATORY NO. 23:**

13 IDENTIFY ALL actions made on behalf of CONNECTU by YOU.

14 Dated: November 3, 2005

Orrick, Herrington & Sutcliffe LLP

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18 Robert D. Nagel  
19 Attorneys for Plaintiff  
20 THEFACEBOOK, INC.  
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